

Airport Corporate Center  
7677 Oakport St., Suite 1120  
Oakland, CA 94621  
Telephone: (510) 839-5200  
Facsimile: (510) 839-3882  
Email: John.Burris@johnburrislaw.com  
Email: Adante.Pointer@johnburrislaw.com  
Email: Patrick.Buelna@johnburrislaw.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

JEFFREY MCELROY, an individual.

Plaintiff,

V.

CITY AND COUNTY OF SAN  
FRANCISCO, et al.

Case No.: 3:19-cv-05528-JSC

STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DISCOVERY AND  
DISPOSITIVE MOTION DATES

IT IS HEREBY STIPULATED, and respectfully requested, by and between Plaintiff and Defendants by and through their designated counsel, that:

WHEREAS, the spread of the COVID-19 virus has caused the State of California Governor and the Counties of Alameda and San Francisco to issue a shelter-in-place order that severely limited business and strictly limited contact with other people that commenced March 23, 2020 and has not been lifted;

WHEREAS, the shelter-in-place order has closed the law offices of both parties' counsel and delayed their abilities to conduct discovery;

WHEREAS, the Defendants have not yet produced documents in response to Plaintiff's Request for Production of Documents and both parties have been unable to conduct depositions;

WHEREAS, the parties met and conferred and agreed to extend discovery dates by approximately 60 days without changing the pretrial filings, pretrial conference and trial date;

WHEREAS, the current discovery schedule is set as:

Deadline to Move to Amend Pleadings: February 6, 2020

Fact Discovery Cut-Off: June 1, 2020

Expert Witness Disclosures: June 8, 2020

Rebuttal Expert Witness Disclosures: June 22, 2020

Expert Discovery Cutoff: July 29, 2020

Deadline for filing Dispositive Motions July 29, 2020

Deadline for hearing Dispositive Motions September 10, 2020

WHEREAS, the parties propose the following discovery schedule:

Fact Discovery Cut-Off: July 29, 2020

Expert Witness Disclosures: August 7, 2020

Rebuttal Expert Witness Disclosures: August 21, 2020

Expert Discovery Cutoff: September 21, 2020

Deadline for filing Dispositive Motions September 28, 2020

Deadline for hearing Dispositive Motions October 29, 2020

1  
2 IT IS SO AGREED.

3 Dated: April 22, 2020

Law Offices of John L. Burris

4  
5 /s/ Patrick M. Buelna  
PATRICK M. BUELNA  
6 Attorneys for Plaintiff

7 Dated: April 27, 2020

City and County of San Francisco

8 /s/James Hannawalt  
9 JAMES HANNAWALT  
Attorneys for Defendants

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11 IT IS SO ORDERED.

12 DATE:

13 HONORABLE JACQUELINE S. CORLEY  
14 U.S. MAGISTRATE JUDGE  
15 NORTHERN DISTRICT OF CALIFORNIA  
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